

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA**

KANAUTICA ZAYRE-BROWN,

Plaintiff,

v.

THE NORTH CAROLINA
DEPARTMENT OF PUBLIC SAFETY,
et al.,

Defendants.

No. 3:22-cv-00191

PLAINTIFF’S NOTICE OF ADDITIONAL AUTHORITIES

Plaintiff Kanautica Zayre-Brown hereby gives notice of additional authorities relevant to her pending motion for preliminary injunction (Doc. 13) and Defendants’ pending motion to dismiss (Doc. 9), of which Plaintiff’s counsel only became aware after the conclusion of briefing on those matters.

1. *Williams v. Kincaid*, No. 21-2030, 2022 WL 3364824 (4th Cir. Aug. 16, 2022). This case holds that gender dysphoria is a disability not excluded by the Americans with Disabilities Act and Rehabilitation Act.

2. *Jensen v. Shinn*, No. CV-12-00601-PHX-ROS, 2022 WL 2911496, (D. Ariz. June 30, 2022), *amended*, No. CV-12-00601-PHX-ROS, 2022 WL 2910835 (D. Ariz. July 18, 2022). This case addresses the opinions of Dr. Joseph Penn concerning the quality of prison medical care. The court found it “difficult to overstate Dr. Penn’s

lack of credibility” and ultimately found his opinion “unworthy of any weight.” *Id.* at *51 n.28, *53.

Respectfully submitted, this the 17th day of August, 2022.

/s/ Jaclyn A. Maffetore

Jaclyn A. Maffetore
NC Bar No. 50849
Daniel K. Siegel
NC Bar No. 46397
Michele Delgado
NC Bar No. 50661
ACLU OF NORTH CAROLINA
LEGAL FOUNDATION
P.O. Box 28004
Raleigh, NC 27611-8004
Tel: (919) 834-3466
Fax: (919) 869-2075
jmaffetore@acluofnc.org
dsiegel@acluofnc.org
mdelgado@acluofnc.org

Christopher A. Brook
NC Bar No. 33838
PATTERSON HARKAVY LLP
100 Europa Drive, Suite 4210
Chapel Hill, NC 27517
Tel: (919) 942-5200
Fax: (866) 397-8671
cbrook@pathlaw.com

Jon W. Davidson*
(admitted only in California)
Taylor Brown*
AMERICAN CIVIL LIBERTIES
UNION FOUNDATION
125 Broad Street, 18th Floor
New York, NY 10004-2400
Tel: (212) 519-7887
Fax: (212) 549-2650
jondavidson@aclu.org
tbrown@aclu.org

*admitted *pro hac vice*

Counsel for Plaintiff

CERTIFICATE OF SERVICE

I certify that on August 17, 2022, I filed the foregoing with the Clerk of the Court using the CM/ECF system which will effect service on all counsel of record.

/s/ Jaclyn A. Maffetore

Jaclyn A. Maffetore

Counsel for Plaintiff